



# Wyoming Department of Agriculture

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March 18, 2005

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Rawlins RMP Revision  
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Following are our comments on the Draft Environmental Impact Statement (DEIS) for the Rawlins Resource Management Plan Revision.

Our comments are specific to our mission within state government: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed revision possesses the potential to dramatically affect the welfare of our agriculture industry, our natural resources, and our citizens for the next 15 to 20 years, we believe it is important to be kept informed of proposed actions and decisions and that we continue to have the opportunity to express pertinent issues and concerns.

Please accept my sincere appreciation for allowing the participation of state and local government officials as cooperators. We believe that the interchange of information and active consideration of suggestions is valuable.

We have made several general comments followed by suggestions that pertain to specific portions of the DEIS. We explain how and why these suggestions will improve the Final EIS.

## **Failure to Actively Consider WDA Recommendations**

Many suggestions made in this letter to improve the Revised RMP were made in our comments regarding the Preliminary DEIS (PDEIS), but were ignored. We recognize that a few of our suggestions were incorporated into the DEIS, and we are appreciative. However, we are disappointed that many meaningful recommendations were dismissed, apparently with little or no consideration and certainly with no explanation. As stated in our comments about the PDEIS and as stated in this letter, we not only identified areas of concern, but recommended changes and the rationale for those changes. We encourage your thoughtful consideration of our recommendations and a dialogue on those recommendations not used.

## **Wild Horses**

The DEIS plans for wild horse are unacceptable for two reasons. As currently written, they violate a Consent Decree between the Bureau of Land Management (BLM) and the State of Wyoming (State) under the jurisdiction of the U.S. District Court for the District of Wyoming. Additionally, they provide for a devastating loss of 30,000 grazing AUMs.

In the Consent Decree, the BLM and the State agree to the following:

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The Wyoming Department of Agriculture  
is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

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“BLM will also use its best efforts for the gathers scheduled in 2004, and for future planned gathers during the term of this consent decree, to remove sufficient wild horses to meet the lower end of the AML that is currently set for each HMA.”

“If BLM determines, based upon the results of any inventory and on projected reproduction rates, that the wild horse population in any HMA or other area in Wyoming is likely to exceed AML in the following fiscal year, the Bureau of Land Management shall in its budget submission to the Department of the Interior for the next budget cycle include a request to reduce that HMA back to AML. If the BLM fails to reduce the number of wild horses to AML by December 15 of the year of the next budget cycle, the State of Wyoming may petition this Court to compel removal of wild horses over AML in the HMA at that time based on the Wild Free-Roaming Horse and Burros Act and applicable law.”

The decree further states that “this Court shall have the continuing jurisdiction over this matter, the Parties to this Consent Decree, any disputes existing under this Consent Decree, and any alleged violations of this Consent Decree.” The decree continues for ten years from August 28, 2003.

Despite the terms of the Consent Decree, the Rawlins DEIS provides for changes in AMLs based upon future monitoring (page 2-16) and notes increases in annual populations until gathers are permitted “every 3-4 years.” Given the current populations of wild horses, as noted in the DEIS, and given the DEIS predictions of an annual population increase of 16 percent for the Adobe Town HMA and 18 percent increases for the Lost Creek and Stewart Creek HMAs, the wild horse populations for these three areas will equal 1,757 in three years and 2,046 in four years. Those compare to a total AML of 920. Those projected populations violate both the spirit and the letter of the consent decree.

Regarding the unacceptable loss of grazing AUMs, Alternative 3 calls for an increase in AML for the Lost Creek herd from the current AML of 70 to a new AML of 165. The preferred alternative (Alternative 4) also indicates a possible change in this AML based upon monitoring. The Summary Comparison of Impacts in Chapter 2 states there would be a loss of 30,000 AUMs under Alternative 3 resulting from this increase in wild horses in the Lost Creek HMA and from a lack of predator control. The Preferred Alternative says the impacts upon livestock grazing “would be similar to those under Alternative 3....” The writing in the section of Chapter Four, Environmental Consequences, that discusses the effects of wild horses upon livestock grazing by the preferred alternative refuses to discuss these impacts. The DEIS says “Impacts ... from wild horse management on livestock grazing would be the same as under Alternative 1.” However, Alternative 1 DEIS fails to mention any impacts of wild horse management on livestock grazing.

Thus, as written, the preferred alternative in the DEIS shows a devastating loss of 30,000 AUMs

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for grazing permittees for this planning area and blatantly violates the Consent Decrees agreed to by the BLM and the State of Wyoming.

In our August 6, 2004 comments on the PDEIS, we alerted you to the fact that increases in wild horse populations would conflict with the consent decree between the State of Wyoming and BLM.

### **Mandatory Nine-mile Buffer between Bighorn & Domestic Sheep**

The DEIS calls for a mandatory nine-mile buffer between bighorn sheep and domestic sheep. This mandatory buffer does not agree with the Final Report and Recommendations from the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group, of which Wyoming BLM was an active member.

This report identified three bighorn sheep management areas in Wyoming: bighorn sheep core, native herds; cooperative review areas; and bighorn sheep non-emphasis areas. The report also identifies bighorn sheep non-management areas. The Working Group identified areas of core, native herds as the highest priority areas for bighorn sheep management in Wyoming. However, core, native herds are not considered in the Rawlins FO RMP planning area. Only areas of cooperative review, non-emphasis, and non-management exist in the planning area. In the non-emphasis areas, the Working Group report states existing big-horn populations will not be protected at the expense of domestic sheep grazing. In non-management areas, the Group states bighorn sheep are permitted to occur in these areas, but are not actively encouraged. In cooperative review areas, changes in bighorn sheep management or domestic sheep use will be cooperative evaluated. Yet, the DEIS fails to recognize any of these recommendations or any other item in the report, despite the fact that BLM was a party to the Final Report and Recommendations.

It is particularly disappointing that the DEIS fails to recognize or adopt the following Group recommendation to federal agencies: "As much as possible, follow the recommendations of the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group and utilize expertise and experience of Working Group participants when planning local bighorn sheep management." The Final EIS and Revised RMP need to acknowledge and reflect the Working Group's Report and Recommendations.

The working group set its goal as "maintain healthy bighorn sheep populations while sustaining an economically viable healthy domestic sheep industry in Wyoming." The mandatory nine-mile buffer may help maintain healthy bighorn sheep populations, but it is likely to critically damage the bighorn sheep industry in the planning area. The Final EIS and Revised RMP need to (1) recognize the bighorn cooperative review, non-emphasis, and non-management areas in the Rawlins planning area, (2) utilize the findings and recommendations of the Final Report and



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Recommendations from the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group, and, (3) for those reasons, delete all references to a nine-mile buffer between bighorn and domestic sheep.

This same topic was discussed in our August 6, 2004 comments on the PDEIS and again in our comments on the preliminary RMP/Draft EIS of January 16, 2004. Our comments were ignored. Nonetheless, we again request that you use the report and recommendations of the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group and dismiss the inappropriate mandate of the nine-mile buffer. As we noted at the beginning of this section, Wyoming BLM was an active member of this Group and a party to its report and recommendations.

### **Grazing only on a Temporary, Non-renewable Basis**

A preferred alternative for Livestock Grazing states:

Livestock grazing use on public lands in vacant grazing allotments is a discretionary action.

The following areas, as identified in the SMA section, would be recognized as vacant allotments and would be grazed on a basis appropriate for that area.

- Chain Lakes
- Pennock
- High Savery

Allotments may be added or removed from this list as the situation warrants

We recommend deleting the first and third paragraphs and retaining the second paragraph, as rewritten. Our rationale follows.

We recommend retaining the second paragraph as rewritten because the MOUs between BLM and the state agencies responsible for those areas say that public lands in those areas will be managed to meet specific objectives. We recommend the revision to allow for flexibility and changing conditions during the duration of the RMP.

We recommend deleting the first paragraph because the Secretary of the Interior has always had the authority under the Taylor Grazing Act and Federal Land Policy and Management Act (FLPMA) to reclassify and withdraw range land from grazing use.

We recommend deleting the third paragraph because it could be erroneously interpreted to mean that any vacant allotment would only be grazed on a temporary, non-renewable basis. Yet, the Supreme Court stated in their decision for 98-1991 on May 15, 2000, that suspended AUMs will continue to be recognized and have a priority for additional grazing use within the allotment.

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They also stated in their decision, "the regulations specify that regular grazing permits will be issued for livestock grazing or suspended use." In a concurring statement, Justice O'Connor noted that should a permit holder find the Secretary "deprives the permit holder of grazing privileges to such an extent that the Secretary's conduct can be termed a failure to adequately safeguard such privileges, the permit holder may bring an as-applied challenge to the Secretary's action at that time. The affected permit holder remains free to challenge such an individual [denial of] grazing privileges, and the courts remain free to determine its lawfulness in context." In other words, permit holders may request grazing privileges for vacant allotments on an active, renewable basis.

Deleting this third paragraph does not preclude BLM officials from adding or deleting allotments from this list, as required by MOUs.

### **Chapter 3, Affected Environment, Livestock Grazing**

We would like to compliment the authors of this section for the excellent and accurate depiction of livestock grazing in the Rawlins planning area. They have correctly displayed the consistent and continuing decline in livestock numbers that graze on public lands in this area. More importantly, they have captured the consistent and continuing efforts by BLM officials and grazing permittees for several years that have resulted in the enhanced health of the rangelands in this area.

### **Lack of Social and Economic Impacts**

The National Environmental Policy Act and the implementing regulations by the Council of Environmental Quality state that the environmental consequences that need to be studied include social and economic impacts. The DEIS is deficient in presenting these impacts. There are a few paragraphs that describe generalized social and economic effects. However, the social and economic impacts of the various alternatives on and by oil and gas, timber, livestock, off-highway vehicles, hunting and fishing, tourism, or other resource uses are not specified. Worse, the narrative fails to describe the specific social and economic impacts upon the communities by each of the alternatives. The demands upon social services, schools, roads, and other services are not mentioned. The impacts of revenues and expenditures of each resource and resource use from each of the alternatives upon the towns in the planning area were not touched upon. The specific impacts, both positive and negative, that are expected as a result of the four alternatives, upon the people of this area were not identified. Thus, the public can not correctly evaluate the impact of each alternative upon the people most affected by this land-use plan.

### **Comments on Specific Portions of the DEIS**

Page 1-10, Vegetation Management. The DEIS refers repeatedly, and appropriately, to the



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Federal Land Policy and Management Act, which states BLM will manage the public lands and their various resources so that they are used in the combination that will best meet the present and future needs of the American people. In FLPMA, Congress declared that it is the policy of the United States that BLM should manage the public lands in a manner that will provide “food and habitat for fish and wildlife and domestic animals”. In most instances, the DEIS recognizes the requirement to provide habitat and forage for the first two, and forgets the third. A typical example is found in the wording for Issue 7: Vegetation Management, which discusses the requirement to provide habitat for wildlife, but fails to mention the requirement for BLM to provide habitat and forage for domestic animals, as well. All areas of the DEIS should be reviewed to ensure the FLPMA policy of managing to provide food and habitat for fish and wildlife **and domestic animals** (emphasis added) is correctly discussed.

Page 1-45/15, Sec. 1.4.2, Land Use and Natural Resource Management. We strongly object to the omission of key words by the DEIS authors in this section that describes the provisions of FLPMA. The first paragraph of this section refers to the Congressional Declaration of United States Policy in FLPMA and the words that provide the foundation for FLPMA. That national policy includes the management of public lands in a manner “that will provide food and habitat for fish and wildlife and domestic animals...”. That provision of U.S. policy was omitted by the authors of the DEIS. As noted in our comments on Vegetation Management above, the DEIS repeatedly omits that portion of the national policy that mentions the need to provide for food and habitat for domestic animals. The environmental consequences of depleted habitat for fish and wildlife abound in the DEIS. The consequences of depleted habitat for domestic animals is rarely mentioned. The importance of providing adequate food and habitat for fish and wildlife is mandated throughout the DEIS. The requirement for providing food and habitat for domestic animals is comparatively non-existent in the DEIS. For these reasons, we recommend these words that were omitted from the quoted paragraph of the Congressional Declaration of U.S. Policy be reinserted and that the Congressional declaration of U.S. Policy that BLM needs to provide food and habitat for “fish and wildlife and domestic animals” be recognized as appropriate throughout the Final EIS and the Revised RMP.

Page 2-8, Sec 2.3.5, Livestock Grazing. Please see our comments above on bighorn/domestic sheep. Again, our earlier comments regarding this section were ignored.

Page 2-13, Sec.2.3.11, Special Management Areas, Upper Muddy Creek Watershed/Grizzly Area. Again, we recommend deleting “other” from the sentence “Livestock grazing use would be managed to provide for protection or enhancement of other resource values.” Although we understand that this area calls for management for other resources and resource uses, to state that livestock grazing can not be used to benefit livestock grazing in addition to benefitting these other uses is wrong. Livestock grazing can and should be used to protect and enhance livestock grazing as well as other resource values.



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As noted in our August 6, 2004 comments to Rawlins FO officials, all appropriate areas of the Final EIS should be rewritten to reflect this change. We have brought the problems of this current wording to the attention of Rawlins FO officials repeatedly during meetings with cooperators, BLM staff, and the BLM contractor personnel. We then referred to our concerns again in our August 6, 2004 comments. Livestock grazing in the Rawlins RMP planning area does not exist solely to protect and enhance resource values other than livestock grazing. Livestock grazing is authorized and promoted by law and regulation as a legitimate commodity use. Moreover, FLPMA notes the need "to provide habitat and forage for fish, wildlife and domestic animals" (emphasis added). Livestock grazing, in and of itself, deserves to be protected and enhanced. All too often, the DEIS implies that the only reason livestock grazing exists in the planning area is to benefit all other resource values. As we noted in our 2004 comments, that mistake deserves to be corrected.

Page 2-14, Sec. 2.3.11, Special Management Areas, Encampment River Potential Wild and Scenic River. We again recommend, as we have in earlier comments, to change "Range improvements and increases in grazing preferences would not be allowed" to read "Range improvements and increases in grazing preferences would be managed to meet watershed objectives." Even the DEIS later notes that "Surface disturbing activities would not be allowed within the viewshed of the Encampment River." (Page 2-60, Alternative 3 and preferred alternative). Thus, surface disturbing activities are allowed outside of the viewshed, but range improvements and increases in range preference are not. That's illogical and unjustifiable. No scientific or non-scientific justification is provided. Range improvements have positive benefits for wildlife and the environment, as well as for grazing. In those areas beyond 1/4 mile from the Encampment River, there should be no reason for not allowing increases in grazing preferences, as appropriate. This is another example of a recommendation that would provide additional flexibility to BLM decision makers in the future, as conditions warrant. We strongly recommend, again, deleting this universal prohibition of improvements and increases in range preferences and including wording similar to that used on page 2-66, which says grazing on the Encampment River Watershed grazing should be managed to meet watershed objectives.

Page 2-26, Summary Comparison of Alternatives, Livestock Grazing, Management Goal. We strenuously objected to the wording of the preferred alternative for the management goal for livestock grazing in our comments on the PDEIS. Our comments were ignored.

Originally, the goal for the preferred alternative read "Same as Alternative 1". That alternative says the goal for livestock grazing management was "to enhance livestock grazing while maintaining a balance between other economic uses and wildlife habitat and watershed and riparian areas while maintaining or improving range condition." Without explanation or opportunity for discussion, Alternative 4, the preferred alternative, was inexplicably changed to read "Livestock grazing will be managed in a compatible balance with other economic uses, wildlife habitat, and watershed and riparian areas, while maintaining or achieving rangeland



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standards.”

Yet, as we noted earlier in our comments herein, national policy calls BLM to provide food and habitat for fish and wildlife and domestic animals. Not just for fish or wildlife or domestic animals, but for all three. Thus, it seems reasonable that BLM personnel would want to manage the public lands to enhance food and habitat for all three. Therefore, it also seems reasonable that BLM officials would want the management goal for Livestock Grazing to be to enhance livestock grazing while maintaining a balance among other resources and resource uses. Similarly, we would expect BLM to manage to enhance food and habitat for fish and wildlife while maintaining a balance among other resources and resources uses.

However, as we noted in the workshops that preceded the PDEIS, nearly every environmental value is “enhanced”, while nearly every commodity value is not “enhanced”, but is allowed to continue to exist as long as it is balanced with other resource (environmental) values. A prime example is found in the words of the preferred alternative for the Livestock Grazing goal. “Livestock grazing will be managed in a compatible balance.... ”

The FEIS should set a pro-active management goal for livestock grazing, and not simply say livestock grazing should be managed to be compatibly balanced. We strongly support adoption of Alternative 1 in the FEIS and that goal be strongly evident throughout the Revised RMP.

Page 2-26, Summary Comparison of Alternatives, Livestock Grazing, Management Action re: Grazing Systems & Range Improvements. Alternative 1 remains as originally worded, “Grazing systems and range improvements would be designed to achieve the management goals for livestock grazing, and would serve, as the primary means of improving or maintaining desired range conditions.” Alternative 4, the preferred alternative, originally read, “Same as Alternative 1.” Without cooperators being notified, Alternative 4 was changed to read, “Grazing systems and range improvements would be designed to achieve and maintain healthy rangelands.” We strongly recommend adoption of Alternative 1 or that the preferred alternative be changed to the original wording that was agreed to by BLM staff and cooperators, “Same as Alternative 1.” While grazing systems and range improvements can and should be designed to help achieve and maintain healthy rangelands, they definitely should also be designed to achieve the management goals for livestock grazing. To expect grazing permittees to fund, construct, maintain or operate grazing systems and range improvements designed to not meet goals of livestock grazing is absurd. The design of grazing systems and range improvements must consider the goals of livestock grazing and the selected alternative should say so.

Page 2-26/27, Summary Comparison of Alternatives, Livestock Grazing, Vacant Grazing Allotments. Recommend the first and third paragraphs deleted in the preferred alternative. Please see our comments above about temporary, non-renewable permits.



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Page 2-43, Summary Comparison of Alternatives, Special Management Areas, Chain Lakes. Regarding the management actions regarding vacant allotments, please see our comments above about temporary, non-renewable permits. However, we'd also like to add that proposed management actions for this area allow the area to be open to oil and gas leasing and the allowance of surface disturbing and disruptive activities, although with intensive management. So, why not livestock grazing? Livestock grazing that meets the objectives for this area should also be allowed, whether as an active renewable allotment or as a temporary, non-renewable allotment.

Page 2-46, Summary Comparison of Alternatives, Special Management Areas, Pennock Mountain wildlife management area. Regarding the management actions regarding vacant allotments, please see our comments above about temporary, non-renewable permits.

Page 2-52, Summary Comparison of Alternatives, Special Management Areas, Historic Trails. We are concerned about the expansion from 1/4 mile to two miles either side of historic trails in the preferred alternative that would be designated as VRM Class II and the impact this expansion will have upon range improvements that could benefit wildlife, livestock, riparian areas, and other resources. We realize that VRM II does not prohibit these range improvements, but this designation may result in the location or changes of range improvements that make them impractical. We also believe that the FEIS needs to recognize that the VRM II designation does not prohibit livestock grazing in this area. We also appreciate and recommend your retention of the wording in the preferred alternative that says the setting that does not contribute to the National Register of Historic Places would be designated the same as surrounding VRM class. This wording recognizes that many trail segments occur in populated areas or areas of development.

Page 2-66, Summary Comparison of Alternatives, Water Quality. Recommend deleting "other" from the selected alternative. Without the deletion, some readers would interpret grazing management as a surface disturbing activity, which it is not. Also recommend changing "intensively managed" to "managed" and then describing the specific management you expect. A word count shows that you used the term "intensively manage" over 50 times with various management actions, resources, and resource uses. Unfortunately, the definition of this term in the Glossary provides few clues as to what you expect. If there are rigorous requirements above normal management, they should have been detailed so that those of us reviewing the DEIS would understand what you're expecting.

Page 2-67, Summary Comparison of Alternatives, Wild horses. Alternative 3 does not meet the requirements of the consent decree, described earlier in our comments. The selected alternative needs to meet the intent of the decree. Please see our general comments regarding wild horses.

Page 2-83. Summary Comparison of Impacts, Wild Horses upon Livestock Grazing. Please our

comments above on wild horses.

Page 2-97, Summary Comparison of Impacts, Impacts on Wild Horses. Please our comments above on wild horses.

Page 3-57, Economic Base. This section fails to capture the importance of agriculture to the planning area. As this section notes in its first sentence, "An area's economic base is comprised of industries that are primarily responsible for bringing outside income into the local economy. Agriculture is perhaps the leading example in the planning area of bringing outside money into the local economy and then turning that money over inside that economy. Virtually every product sold by ranchers and farmers is sold outside the state of Wyoming and outside the local economy. Yet, nearly every dollar expended by these agriculture producers are spent within the state and most within the local economy. Just as importantly, their revenues don't fuel a boom or bust economy, but provide a needed foundation of stability for local economies.

Another factor not considered is the revenues generated in the area by ranchers and farmers compared to their negligible demand upon governmental services. Studies in Wyoming and Montana show that agriculture producers place little demand upon a town's or county's services. For every dollar generated for the community, the demand for community services is far under a dollar. These same studies show that developments often result in higher demand for services than the revenue contributed. Thus, the demands upon schools, police, fire, road maintenance, and other social services are greater than the revenue generated by developments. For every dollar in revenue, demands upon the town and county far exceed that dollar in costs.

These social and economic impacts are not evaluated in the EIS, and they need to be.

Page 3-106, Sec. 3.15.4, Vegetation Health. The paragraph on wild horses (1) fails to mention the populations of wild horse that far exceeded AMLs and (2) understates the impact of these excessive wild horse populations upon the vegetation. The impacts of wild horses upon resources in the planning area contributed to the need for the consent decree. These facts need to be mentioned in the final analysis.

Page 3-123/316, Sec. 3.18, Wild Horses. Please refer to our earlier comments on wild horses.

Page 3-135, Sec 3.19.1.5, Big Game Species Habitat, Bighorn Sheep. Please refer to our earlier comments on bighorn sheep.

Page 3-139, Sec. 3.19.2.6, Preble's Meadow Jumping Mouse Habitat Management and Critical Habitat Management (Threatened). These paragraphs need to depict the latest findings and actions by the U.S. Fish and Wildlife Service regarding delisting of the species.



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Page 4-5/4-9, Sec. 4-2, Air Quality. The quality emission comparison approach is flawed. This section says emissions were calculated for mineral development, livestock management activities, off-highway vehicle use, resource roads, and vegetation management. The section further states activities related to transportation and recreation were assumed to be minor sources of transmission. Regarding transportation, the comparison fails to mention the daily impact of many thousands of vehicles that travel on Interstate 80, which cuts through the middle of the planning area. Any other air quality emission impact from vehicle use in the planning area pales in comparison. While the document notes that livestock management activities were documented, the DEIS fails to recognize the emissions and dust of the travel of 80,000 participants in hunting and fishing and the emissions and dust of the travel of another 80,000-plus wildlife-viewing participants, as documented in the DEIS sections on recreation. In addition, there are the tailpipe emissions and dust generated by government official vehicles. In comparison, the rare trucking of livestock and the occasional checking of livestock improvements results in dramatically far less tailpipe emissions and dust. These effects are certainly less than just 15 minutes of vehicular travel on I-80 and even markedly less than the daily average of 438 recreational participants, which the DEIS refuses to acknowledge. We noted several of these flaws in our comments of August 6, 2004. Again, they were ignored. If BLM officials are going to tout their qualitative emission comparison approach, they need to ensure the approach compares all emission activities. The DEIS currently selects a few and omits others; others that deserve to be compared.

Page 4-10/4-25, Cultural Resources. Again our comments of August 6, 2004 were ignored. According to the DEIS, livestock can create impacts on cultural resources, wildlife can not. Livestock trample and wallow; wildlife do not. This portrays a bias that should not occur in this analysis. The Final EIS (FEIS) should document the impacts of livestock, but should also document the impacts of wildlife. The FEIS should also document the impacts of both livestock grazing management and wildlife management. As the DEIS notes in Chapter 3, livestock grazing management by BLM officials and grazing permittees is designed to reduce long-term impacts from grazing. Moreover, this area has historically encountered grazing and browsing animals for centuries. Impacts upon cultural resources that have resulted from such browsing and grazing have likewise occurred for centuries. The Final EIS needs to accurately depict all impacts, not just a select few. We'd like to add that the narrative for Alternative 4 says wildlife impacts on cultural resources are discussed under Alternative 1. They are not. Wildlife impacts are omitted.

Page 4-41, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. The DEIS is inaccurate in depicting the impacts of wildland fire upon livestock grazing. The DEIS says "Deferment of livestock use after a wildland fire...would have a short-term effect on livestock operators...." To be more accurate, the sentence should read "Deferment of livestock use after a wildland fire...could have a short-term, but gravely adverse, effect on livestock operators...." As currently worded, the DEIS implies that the deferment of livestock use is of little consequence to the grazing permittee. That is wrong. The deferment may result in additional expenses or lost revenues that could drive the grazing permittee out of business. To cavalierly dismiss these



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effects is to erroneously portray these effects. We noted this recommendation in our earlier comments; again, they were ignored.

Page 4-42, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. Regarding the paragraph about the nine-mile buffer between bighorn and domestic sheep, please refer to our previous comments in this letter.

Page 4-42, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. The paragraphs on the effects of mineral development on livestock grazing fail to show the horrendous effects that dense mineral development would have upon livestock grazing. The effects need to be described. The potentially disastrous effects created by the intense mineral development in the Jonah Infill area are likely to be re-created in the Rawlins planning area. These impacts as well as compensatory and off-site mitigation need to be discussed in the analysis and Revised RMP.

Page 4-43, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. The paragraphs on recreational impacts on livestock grazing are understated. All impacts are depicted as minor and small. But then these paragraphs say these impacts are likely to increase over the life of the plan. In the recreation sections of the DEIS, BLM says the growth in recreation will be the same as it was for the last 10 years. However, that growth is not a straight-line increase, but an accelerating increase. Through the 15-year life of this plan, those recreational impacts will force some livestock producers out of business. Those impacts are neither minor nor small. The growth of recreation impacts upon livestock grazing should be more accurately presented. Our August 6, 2004 comments in this area were again ignored.

Page 4-43, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. The paragraphs on the effects of special management areas on livestock grazing are minimized. For example, they fail to mention the effects of the 2-mile VRM II classification on grazing permittees and range improvements. They also fail to mention the significant increase in costs of livestock grazing through reductions in AUMs and changes in grazing activities that are likely to occur in these areas. These paragraphs need to document these adverse effects, not ignore them. Again, our comments of August 6, 2004 in this area were disregarded.

Page 4-44, Sec. 4.7.1, Livestock Grazing, Impacts Common to All Alternatives. The paragraph on the impacts of wild horses upon livestock grazing grossly understates these impacts. Please see our previous comments in this letter.

Page 4-51, Sec. 4.7.5, Livestock Grazing, Impacts Under Alternative 4L Preferred Alternative. The first paragraph states that the impacts of wild horse management would be the same as under Alternative 1. But the impacts of wild horse management are not discussed under Alternative 1. Page 4-212, Sec. 4.19.1, Wildlife and Fish, Impacts Common to All Alternatives. The last



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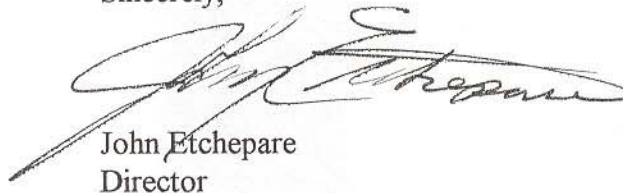
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sentence of the first paragraph depicting the effects of livestock grazing implies that all livestock at all times reduces the stability of riparian areas. That just isn't true. Grazing management, adherence to the Standards for Healthy Rangelands, annual operating plans, Best Management Practices, and other management techniques employed by BLM range specialists and grazing permittees often results cattle use of riparian areas that enhances or maintains the stability of riparian areas. We recommend rewording this paragraph accordingly.

We appreciate your active consideration of our comments and appreciate the opportunity to comment. We look forward to working with you to further improve the EIS analysis and the Revised RMP.

Sincerely,



John Etchepare  
Director

JE/dc

CC: Governor's Planning Office  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Game and Fish